

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER
DISASTER SITE LITIGATION

21 MC 102 (AKH)

BERTHA TACHE,

Plaintiff(s),

DOCKET NO. 07-cv-1537-AKH

v.

100 CHURCH STREET, et al.,

Defendants.

**NOTICE OF CROSS-MOTION FOR
CONTEMPT AND TO COMPEL
COMPLIANCE**

PLEASE TAKE NOTICE that on a date and time to be established by this Court, upon the Declaration of Pamela B. Goldsmith, Esq., sworn to on February 20, 2014, the exhibits annexed thereto, and upon all pleadings and proceedings had herein, defendants Zar Realty Corporation and 100 Church, LLC, by and through their attorneys, Harris Beach PLLC, will cross-move this Court, at the United States District Courthouse, 500 Pearl Street, New York, NY 10007 for an Order:

1. Denying non-party Dr. Carlos J. Serrano's Motion for a Protective Order in its entirety;
2. Compelling non-party Dr. Carlos J. Serrano to appear for a deposition in the above-captioned matter; and

3. For such other and further relief as this Court may deem just and proper.

Dated: New York, New York
February 20, 2014

Respectfully submitted,

HARRIS BEACH PLLC

s/ Pamela B. Goldsmith, Esq.

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ZAR REALTY CORPORATION and
100 CHURCH LLC

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